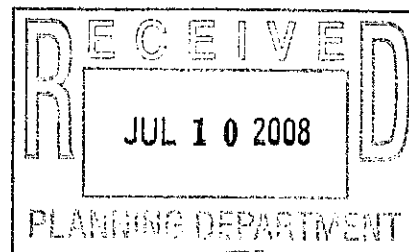


The Town of  
**Leesburg,  
Virginia**

25 West Market Street ■ P.O. Box 88 ■ 20178 ■ 703-777-2420 ■ Metro: 703-478-1821 ■ FAX: 703-771-2727 ■ [www.leesburgva.org](http://www.leesburgva.org)

July 8, 2008

John Merrithew  
Assistant Director of Planning  
Loudoun County Department of Planning  
1 Harrison Street, SE  
P.O. Box 7000  
Leesburg, VA 20177



**RE: Referral request for ZMAP 2008- 0009; Leesburg West JLMA**

Dear Mr. Merrithew:

On June 19, 2008, a request was made of the Town of Leesburg to provide referral comments on the above referenced item, ZMAP 2008-0009. This ZMAP is a Board of Supervisors initiated rezoning of property west of the Leesburg Executive Airport (LEA), also known as the Crosstrail property. The proposal is to change the current zoning on the property from JLMA 20 to PD-IP, Planned Development- Industrial Park.

On July 8, the Leesburg Town Council reviewed this item and provided staff guidance on the referral, as contained herein:

**Recommendation:**

The Town Council and Town staff has reviewed the proposal, and we have no objections to the rezoning, provided concerns outlined below are addressed.

**Analysis:**

Background

In July of 2007, the Loudoun County Board of Supervisors took a formal vote, and denied, ZMAP 2005-0011, which was a proposed rezoning for the property known as Crosstrail. The Crosstrail property, which is approximately 491 acres of vacant land directly adjacent to the western border of the LEA, had been the subject of a rezoning proposal seeking 1,020 residential units and approximately 3 million square feet of non-residential uses.

As part of the evaluation of the proposal, County staff invited Town input on the proposal via the established referral process, whereby Town staff is asked to formally comment on projects

adjacent to the Town, for inclusion in the County's evaluation of the project. As such, the Town commented on the proposal via formal referral and Town Council Resolution, and a number of issues were raised leading to a Town recommendation of denial. It should be noted that through the course of the project, the applicant made numerous changes and produced a variety of iterations of the proposal that were subsequently reviewed and commented upon by the Town.

These issues included, but were not limited to, the inclusion of residential units within the traffic pattern of aircraft utilizing LEA, the inadequacy of proffers for off-site transportation improvements, phasing of the development plans, provision of utilities for the site, and land available to LEA for future expansion per the Airport Master Plan. Numerous discussions were held regarding these issues, but little finality was attained up to and including the day of the vote by the Board of Supervisors.

It should be noted that in addition to the rezoning application, there was a Board of Supervisors initiated Comprehensive Plan Amendment (CPAM 2006 0002) that was approved prior to the decision of the rezoning. That CPAM changed the land use category of the Crosstrail property to Business Community Mix, which allowed for 25% of the development to be used as residential.

It should be noted that the Leesburg Town Plan classifies this land as predominantly Regional Office and envisions the land use as primarily office, with supporting and ancillary uses as appropriate, to support non-residential development.

Since the denial of the rezoning application, the applicant has retained counsel and sued the County for its decision on the application.

#### Proposal:

On June 3, 2008, the Board of Supervisors directed County Planning staff to process a Board initiated rezoning for the Crosstrail property. The direction given to staff was to change the zoning on the property from JLMA 20 (existing zoning) to PD-IP, Planned Development-Industrial Park.

Per Section 4-503 of the Loudoun County Zoning Ordinance, the PD-IP zoning category allows for a variety of uses, including, but not limited to, the following, which Town staff concludes are potentially the most intensive of the allowable uses: distribution facilities, manufacturing, flex-industrial uses, research and development, warehousing, utility substations, sewer pumping stations, motor vehicle repair (light), and contractor establishments. It should also be noted that this zoning designation also allows for a 100% office component as well, and that no residential development is allowed or encouraged. There are also various uses allowed by special exception, pursuant to Section 4-504 of the Loudoun County Zoning Ordinance.

It should be noted that even though this is a planned zoning district, there are conventional zoning standards ascribed to the category, including an established FAR, setbacks, height, and lot coverage, which ultimately serve to regulate development intensity. There are also performance standards associated with most of the intensive uses allowed, as enumerated in the ordinance.

**Recommendation:**

As stated previously, the Town supports the Board of Supervisors initiated rezoning.

However, the Town Council has expressed concern regarding some of the uses allowed within the district by right, as well as by special exception. This concern is based on the premise that some categories of uses, including manufacturing, distribution, auto repair, and contractor service establishments, could potentially have significant impacts or undesirable components, based on the specific details and intensity of a particular application. Therefore, the Town encourages significant County oversight of this potential issue. This is particularly true of the special exception uses, acknowledging, however, that there are performance standards in the ordinance to mitigate the most serious potential for negative impacts associated with special exception uses.

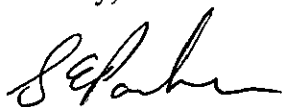
In addition, the Town has a concern that, given the potential intensity of uses allowed within the PD-IP category, proper infrastructure is in place to support the types of uses allowed. The Town encourages the County to ensure the viability of various infrastructure components when considering site plans for development within the new PD-IP zoning designation.

**Conclusion:**

The Town supports the Board initiated rezoning to PD-IP, provided that the concerns noted above are addressed.

Thank you for the ability to provide input on this project. Should you require further information, do not hesitate to contact me at 703.771.2771.

Sincerely,



Scott E. Parker, AICP  
Assistant to the Town Manager  
Town of Leesburg

Cc: Town Council  
Planning Commission  
John Wells, (TOL, Town Manager)  
Kaj Dentler, (TOL, Acting Director of Planning and Zoning)  
David Fuller, (TOL, Comprehensive Planner)

/sep